

CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Shatifah S. Lobley ; DOB: 1992; United States Richard Morris ; DOB: 1985; United States	MAGISTRATE'S CASE NO. 20-04405 MJ
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about February 8, 2020, in the District of Arizona, Shatifah S. Lobley and Richard Morris , named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, namely Giovana Teresa Reynoso-Navarro and Enrique Nava-Garcia, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A); 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On or about February 8, 2020, in the District of Arizona, United States Border Patrol Agents (BPA) conducted a traffic stop on a 2016 Ford F150 near San Simon. Inside the vehicle, BPAs observed five subjects, including the driver, Shatifah S. Lobley , and front passenger Richard Morris . BPAs questioned the three individuals in the backseat, including Giovana Teresa Reynoso-Navarro and Enrique Nava-Garcia, who all admitted they were citizens of Mexico and Peru, and were in the country illegally. In a post- <i>Miranda</i> statement, Lobley stated after picking up the illegal aliens, Morris had GPS directions to Phoenix on his phone. She further stated she believed Morris knew the three individuals were illegal aliens, but that she was unaware of the status of their citizenship. Material witnesses, Giovana Teresa Reynoso-Navarro and Enrique Nava-Garcia, both stated they had made arrangements to be smuggled into the United States for various amounts of money. The material witnesses stated after crossing into the United States illegally, they were taken to a location where they were told a vehicle would be picking them up and taking them to Phoenix. They both stated a blue Ford truck arrived with Shatifah S. Lobley and Richard Morris in the vehicle. Reynoso-Navarro stated he was told to get into the vehicle, and that the driver and passenger already knew where to take them. Nava-Garcia stated when they got into the vehicle, Lobley motioned for them to lay down, and that he believed the driver and passenger knew they were illegal aliens, because they knew where to pick them up.	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: Giovana Teresa Reynoso-Navarro and Enrique Nava-Garcia	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA JAA/lmw <i>[Signature]</i>	SIGNATURE OF COMPLAINANT <i>[Signature]</i> OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE <i>[Signature: Maria S. Aguilera]</i> DATE February 10, 2020	